ENVIRONMENTAL
Fact Sheet

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

29 Hazen Drive, Concord, New Hampshire 03301 • (603) 271-3503 • www.des.nh.gov

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Management of Engine Test Tank Wastewater for Marinas

Test tank engine wastewater may contain a variety of harmful constituents such as benzene, ethyl benzene, xylenes, toluene, methyl tertiary-butyl ether (MtBE), petroleum compounds, and heavy metals. In order to avoid contamination of surface and groundwater, test tank wastewater should be managed properly.

Best Management Practices

Not all marinas change the water in their test tank at the end of the season. The next time your marina decides to change the water, ask the question **why**? Is it really necessary to change the water? Is it necessary to clean the tank every year? By not changing the water, the marina is able to reduce the generation of waste and save time and money. Fresh water can be added to the tank to offset any evaporation.

A common practice among marinas is to place bilge socks or mats in test tanks to absorb contaminants, and prolong the use of the water. Some bilge socks transform the organics into a polymer that may not be considered a hazardous waste, while the mats do not have this capability. The used absorbent material would have to be tested prior to disposal to determine if the absorbent is a hazardous waste. If the marina can verify that the absorbent is only contaminated with oil, and not mixed with gasoline or heavy metals, the absorbent can be managed as a solid waste.

Check the tank for leaks, especially if it is outdoors, to minimize discharge to ground and surface water.

Best Management Practices for Indoor Test Tanks

- Properly vent the tank with a fume hood to outside.
- Floor drains should be sealed, connected to a **registered holding tank**, or connected to municipal sewer system.
- Drainpipes should not discharge to surface water or to the ground. Consider permanently closing the pipes.

Best Management Practices for Outdoor Test Tanks

- Cover the test tank to avoid contamination of rainwater, which could lead to overflow.
- Rain also increases the likelihood of rust, which would compromise the structural integrity of the tank. Most new tanks are galvanized, so marinas may want to

purchase a non-rust test tank. Marinas may want to consider moving the test tank inside the facility.

- Test tanks should never be drained outside where the wastewater could runoff into a lake, tributary or any surface or groundwater.

Proper Disposal of Test Tank Wastewater
Disposal options for test tank wastewater depend on whether the wastewater meets the definition of a hazardous or non-hazardous waste.

The spent or used test tank wastewater is subject to a hazardous waste determination. The water should be tested for "toxicity characteristic leaching procedure" (TCLP) metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), volatile organic compounds (VOCs) by EPA method 8260, and ignitability. The New Hampshire Department of Environmental Services (DES) **Hazardous Waste Compliance Section** maintains a **list of laboratories** that can perform tests for hazardous waste. After the wastewater has been tested once, the marina may use subsequent generator knowledge of the characteristics of the waste to make a determination, rather than test every time the wastewater is sent for disposal. However, this rule does not apply if there has been a change in the process.

1. **Transport Off-Site for Disposal as Hazardous Waste**
   If the TCLP shows the wastewater to contain hazardous constituents above the regulatory limit, the wastewater must be disposed as a hazardous waste per the ***N.H.Hazardous Waste Rules*** (PDF). Contact a licensed hazardous waste transporter to dispose of the waste accordingly. The waste counts towards the marina's generator status, must be manifested, and the marina is charged a New Hampshire hazardous waste fee.
2. **Discharge to Sewer as Non-Hazardous Waste**
   If the wastewater is non-hazardous (as determined through the hazardous waste determination), the marina may be able to discharge the wastewater to the local publicly owned treatment works (POTW). Check with the POTW to ensure the level of constituents meets the POTW's sewer use ordinance limitations. **Do not** discharge to a septic tank or leach field system.
3. **Transport Off-Site for Disposal as Non-Hazardous Waste**
   If the wastewater is non-hazardous (as determined through the hazardous waste determination), then the marina may be able to have the wastewater transported off-site for disposal. As stated above, the marina may contact the local POTW to see if it will accept the non-hazardous test tank engine wastewater for discharge into the headworks of the facility.

The marina may also contract a transporter or a septic hauler to dispose as a non-hazardous waste. The marina will not have to count the waste towards their generator status and will not have to pay a New Hampshire hazardous waste fee. Label the drums as "non-hazardous wastewater" and have the test results easily accessible.

If using this disposal option, the marina can pump the wastewater into a **registered holding tank** temporarily for future pick-up and disposal.

Do not discharge test tank wastewater to surface water, gravel parking lots, vessel-cleaning stations, or to the ground. Even if it passes a TCLP test, test tank wastewater is an industrial waste, and must be managed properly.

Generator Requirements
Test tanks typically contain 300-500 gallons of water. By disposing of the wastewater as a

hazardous waste, the marina can change generator status from a **small quantity generator** (less than 220 lbs. of hazardous waste generated per month) to a **full quantity generator** (more than 220 lbs. of hazardous waste generated per month). Small quantity generators have less stringent requirements than full quantity, so there is an economic advantage to remaining a small quantity generator. Be sure the waste is labeled and stored properly at all times. The ***N.H.Hazardous Waste Rules*** (PDF) are available online at **www.des.state.nh.us/desadmin.htm**, or by contacting the DES Public Information Center at (603) 271-2975.

Conclusion
These guidelines are meant to address questions surrounding engine test tank wastewater management and disposal. Contact NHPPP at (800) 273-9469 or **nhppp@des.state.nh.us** for further information on *Best Management Practices for NH Marinas*.

For More Information
The information provided is intended to give only a basic idea of the rules, regulations, and management options that must be considered by marinas to be in compliance with applicable state and federal regulations. Contact the appropriate DES program to verify rules and regulations to ensure that your marina is in compliance.

Hazardous Waste Compliance Section
Telephone: (603) 271-2942
Email: **hwcomp@des.state.nh.us**
Website: **www.des.state.nh.us/hwcs/**

Groundwater Discharge Permitting and Registration
Telephone: (603) 271-2858
Email: **mlocker@des.state.nh.us**
Website: **www.des.state.nh.us/dwspp/gwdisch.htm**

Pretreatment Program (Wastewater)
Telephone: (603) 271-2052
Email: **gcarlson@des.state.nh.us**
Website: **www.des.state.nh.us/wwe/permits_compliance.htm**

Watershed Management Bureau
Telephone: (603) 271-2959
Email: **jcolburn@des.state.nh.us**
Website: **www.des.state.nh.us/wmb/**

Pollution Prevention Program
Telephone: (603) 271-6460
Email: **nhppp@des.state.nh.us**
Website: **www.des.state.nh.us/nhppp/marinas.htm**

Limnology Center – Lakes and Ponds
Telephone: (603) 271-3414
Email: **jconnor@des.state.nh.us**
Website: **www.des.state.nh.us/wmb/**